

ENCLOSURE NOT INCLUDED

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Mr. Bryan W. Dixon, Director
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087, Capitol Station
Austin, Texas 78711

Re: Fort Bliss - Department of the Army
EPA I.D. Number TX4213720101

Dear Mr. Dixon:

Enclosed is a copy of the inspection report completed by Region 6 during its lead inspection at Fort Bliss - Department of the Army on November 12, 1986. It is noted that while Region 6 conducted the lead inspection at the facility, the Texas Water Commission (TWC) is expected to initiate the enforcement action. Possible violations found at this facility include:

A. GENERATOR CHECKLIST

1. Manifest

- o The generator has not receive a copy of the Safety - Kleen manifests with the hand written signature of the owner/operator of the designated facility.

40 CFR 262.42(a) / TAC 335.13(e) pg. 5 (Class II)

- o The generator did not file an Exception Report to the Administrator regarding the fact that a copy of the Safety - Kleen manifests were not returned within 45-days of the date the waste was accepted by the initial transporter.

40 CFR 262.42(b) / TAC 335.13(f) pg. 5 (Class I)

B. TSD FACILITY CHECKLIST

1. Waste Analysis

6H-CE:STATES:reta:2851:1/8/87

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- o The owner/operator has not obtained detailed chemical and physical analyses of representative samples of all hazardous waste prior to treating, storing or disposing of those wastes.

40 CFR 265.13(a)(1) / TAC 335.112(a)(1) pg. 9 (Class I)

2. Security

- o A sign with the legend, "Danger - Unauthorized Personnel Keep Out," is not posted on and around the Active Drum Storage area (Building 11614).

40 CFR 265.14(c) / TAC 335.112(a)(1) pg. 11 (Class I)

3. Personnel Training

- o Facility personnel have not successfully completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance.

40 CFR 265.16(a)(1) / TAC 335.112(a)(1) pg. 12 (Class I)

4. Preparedness and Prevention

- o The drum storage facility (Building 11614) is not equipped with an internal communications or alarm system capable of providing immediate emergency warning or instruction to facility personnel.

40 CFR 265.32(a) / TAC 335.112(a)(2) pg. 13 (Class II)

- o The drum storage facility (Building 11614) is not equipped with a device, such as a telephone or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

40 CFR 265.32(b) / TAC 335.112(a)(2) pg. 13 (Class II)

C. CLOSURE and POST-CLOSURE

1. Closure

- o The owner/operator does not have a written closure plan for the fire training pit, nor is there a description in the plan of the manner of disposal for 1561 drums of assorted waste.

40 CFR 265.112(a) / TAC 335.112(a)(6) pg. 19 (Class I)

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It was observed during the visual site inspection that this facility has two surface impoundments, the Old Fire Training Pit and the New Fire Training Pit. The Old Pit was last used in November 1984. Within the past year, Fort Bliss did some grading and leveling work at the site even though no closure plan was submitted to either TWC or EPA for approval. Since this Old Fire Training Pit was apparently used to manage hazardous waste, a closure plan submitted in accordance with 40 CFR Section 265.110 through Section 265.115 as adopted by TAC 335.112 (a)(6) is required. Therefore, we recommend that all activity cease until a closure plan, which address's procedures for removal of waste contaminated soils in, under and around the Old Fire Training Pit, be submitted to both TWC and EPA for approval before Fort Bliss can commence closure.

Based on the nature of the violations listed above, EPA would recommend the issuance of a RCRA § 3008 Compliance Order with penalties.

Should you have any question or comments, or disagree with any of our findings or recommendations, please call me at (214) 767-9730 or have your staff contact Samuel Tate at (214) 767 0497.

Sincerely yours,

William H. Taylor, Jr., Chief
Enforcement Section

Enclosure

bcc: G. Reiter (6H-H0)
D. Peters (6H-SH)
B. Hanneschlager (6H-E) ✓
B. Bisor (6H-CE)

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